

Upper Animas and SMC

Sabrina Forrest to: Andrea Madigan

03/01/2010 02:03 PM

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Sabrina Forrest/R8/USEPA/US

Andrea, I got your vmail and will try to respond as fully as possible regarding the status of projects within the Upper Animas. Most of my focus has been in the Upper Cement Creek area, where the worst environmental contamination problems are located. I also left vmail at your extension with most of this information.

Our START contractor recently completed a listing viability analysis, which focused on mine sources in Upper Cement Creek that are having an impact on the Animas River TMDL compliance point A72. Targeted Listing would be one way to deal with some of the worst loaders in the watershed, but listing does not have community support at this point in time. The Animas River Stakeholders Group (ARSG) would like to pursue other options first. In order to do a targeted listing, the ARSG and locals would need to determine they can't address costly water quality needs with their approaches and that the NPL would be the route they desire, then EPA could swiftly move to collect new source area and pathway data to support a listing package. Right now, I am focusing my data collection on water quality support which will help EPA, BLM, and the ARSG identify where improvements to water will have the most impact.

On that front, I have been working with one of our field biologists, the R8 lab, and BLM out of Durango and Silverton to conduct monthly water quality sampling, with a focus on characterizing water quality changes and loads over time from the worst mine-related discharges in the watershed. These include the Mogul, Red & Bonita, and Gold King 7 level mines, the American Tunnel, and a bit from the Grand Mogul mine. At this time, these efforts are being funded by Site Assessment, so we could use some of the SMC funds to offset this work. However, my preference would be to have the funds go toward some actual source removal and containment effort that will actually help overall water quality in this part of the basin. The Red & Bonita is a good candidate for that type of work.

Since the American Tunnel was bulkheaded (three times; last one in about 2002), flows have been changing, with significantly increasing loads from these Upper Cement Creek areas. Also, active water treatment ceased in 2005 and data from our May - November efforts have shown that the Mogul, Red & Bonita, and Gold King 7 Level mines, and the American Tunnel, are impacting prior water quality improvement that the ARSG had seen at A72. These are sites that really need to get addressed. These loads appear at this time to be greater than the combined loads calculated by the ARSG during their 2001-ish TMDL process and Use Attainability Assessment. I have attached them for Steve's benefit, but you might find them interesting.



Upper CC loads 2009.pdf

As you know, almost 90% of the land in San Juan County is public land. I have been talking with BLM Barbara Hite about where they want to put their SMC funds to use - I don't have a clear answer on that one, but they have said that it makes sense for us to use the funds on similar sites so the money doesn't get spread too thin across too many sites. However, I hope BLM will have a significant role in what gets done at the American Tunnel, Mogul, and Grand Mogul among other sites in the overall watershed due to their management piece of portions of these parcels and recognizing their impacts to the environment. The Red &

Bonita seems to be one for which EPA could most easily/quickly begin a removal assessment, but Steve Way is trying to mesh their schedule with that of the BLM and BLM might not be able to mobilize this field season due to their prioritization process and their timing for funds.

There is also a significant landowner in the Upper Cement Creek area, who needs to be pressed to do work or somehow participate in cleanups at the Mogul, Grd. Mogul, and Gold King 7 Level. He has several discharges which the State of Colorado Water Quality Control is not pressing him to deal with. He happens to own much of the land where BLM and the ARSG hope to put a demonstration water treatment facility; downstream of the American Tunnel discharge in the Gladstone area. The ARSG has BLM support for this demonstration facility idea, but everyone is just in the planning and costing out phase of this. Therefore, the ARSG and BLM hope to get this landowner to cooperate somehow to make the facility idea work.

I hope this helps. Please call or email me if you need more.

Sincerely,

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